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**From:** Pierce - CDPHE, Gordon [gordon.pierce@state.co.us]  
**Sent:** 3/20/2018 4:38:42 PM  
**To:** Payton, Richard [Payton.Richard@epa.gov]  
**Subject:** Ozone EE draft  
**Attachments:** 2017.9.2-4 O3 EE Draft 2018.3.19.pdf

Richard,

In case you would like to take a quick look, attached is the full in-review draft of the ozone EE for 9/2 and 9/4/17. It needs some additional edits, but it should answer the questions you had previously. Let me know what you think.

Thanks,  
Gordon

----- Forwarded message -----

From: Payton, Richard <Payton.Richard@epa.gov>  
Date: Wed, Mar 7, 2018 at 9:14 AM  
Subject: RE: Technical Section -- EE demonstration  
To: "Landes - CDPHE, Scott" <scott.landes@state.co.us>  
Cc: "bradley.rink@state.co.us" <bradley.rink@state.co.us>

Sorry for the misunderstanding; I did not realize you all were looking for feedback on the drafts; I just wanted them early to get started on my concurrence action; I had not actually started that until I heard Bradley's voice mail this am.

In general, the drafts look like they will meet the need. Just some minor nitpicking on the conceptual model:

Section 3.3: I concur, you don't need to go into ozone augmentation by smoke in detail, based on other prior demos. I would like to see the conceptual model at least mention what you would expect ozone to be like on a 90 or 93 degree day in the 1st week of September, vs. what you did see, and a statement that the smoke likely augmented the concentration; that is your "concept" for ozone on the day and why it is an EE. EE smoke/ozone guidance, p. 7, Sec. 2.1 ([https://www.epa.gov/sites/production/files/2016-09/documents/exceptional\\_events\\_guidance\\_9-16-16\\_final.pdf](https://www.epa.gov/sites/production/files/2016-09/documents/exceptional_events_guidance_9-16-16_final.pdf)), the conceptual model should discuss "chemistry of event and non-event O3 formation in the area". Also is to discuss "the regulatory significance of the proposed data exclusion". I did not see these elements.

Sections 4: To my knowledge, you are the only Q/d > 100 since the ozone/smoke guidance came out. The historical comparisons look excellent; rest covers the needs.

Richard

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Gordon Pierce  
Program Manager



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